

Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review -
Review of the Commission's Broadcast Ownership Rules
and Other Rules Adopted Pursuant to Section 202
of the Telecommunications Act of 1996,
Notice of Proposed Rulemaking,
MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commissioners, and Chief, Media Bureau

I am writing to you today to comment on Docket No. 02-277, the Biennial Review of the FCC's broadcast media ownership rules. In promoting its supposed goals of fair competition, diversity and local voice in today's media market, I strongly believe that the FCC should retain all of the current media ownership rules now in question. These rules serve the public interest by limiting the market power of the huge, dominant companies and players in the broadcast industry.

I do not believe that the studies commissioned by the FCC accurately demonstrate, or even attempt to demonstrate, the negative effects that media deregulation and consolidation have had on the diversity of our media. While there may indeed be more sources of media than ever before, the spectrum of views presented has been severely limited.

The right to conduct an informed debate and discussion of current events is part of the founding philosophy of our nation. Our forefathers believed that democracy was renewed in the marketplace of diverse ideas. If the FCC allows our media outlets to merge and consolidate further, our ability to have an open, informed discussion from a wide variety of viewpoints will be compromised.

I urge the FCC to preserve the public interest by keeping the media ownership rules in question intact.

When our Constitution was signed, there was nothing comparable to today's media, but accumulation of power was taken very seriously. Concentrated media is a threat to free speech, free press, and free elections. Who owns the media, controls the agenda. Robert McChesney pointed out in his book, 'Corporate Media and the Threat to Democracy' that when Americans occupied Japan, they mandated that their media not become concentrated, because it would tend to fascism. We should consider again the mandate for ourselves. Consider the clear prevalence of right-wing pundits in all US media. As Senator Daschle pointed out, talk radio is monopolized by right-wing conservatives who are anti-intellectual idologues. Their speech is a public health hazard. (Check out <http://www.takebackthemedias.com/index.shtml>)

Ben Bagdikian's book, The Media Monopoly, convincingly showed many years ago that media concentration had already proceeded too far. The trend has accelerated.

In blatant disregard of such warnings, the Congress removed restrictions on concentration of media ownership in the 1996 Telecommunications Bill. Then Westinghouse/CBS bought Infinity broadcasting for \$4.9 billion, Time

Warner and Turner Broadcasting merged in a \$6.7 billion dollar deal, Nynex bought Bell Atlantic for \$22.1 billion, Rupert Murdoch's News Corp acquired full ownership of New World Communications Group for \$3 billion making it the largest TV station owner with 22 outlets, US West paid \$10.8 billion for control of Continental Cablevision, Gannet acquired Multimedia Entertainment for \$1.7 billion; British Telecommunications bought MCI for \$23 billion, and now, the largest yet, the merger of AT&T and TCI. Similar consolidation has occurred among newspapers. As media cheer ever-larger mergers, competition has yet to appear.

Not only has media been relieved of public responsibility, and become more concentrated, it has an agenda that only a fool would think is 'liberal'. All four television networks, radio, and newspaper chains are conservative activists. Two of our major networks are owned by defense/nuclear contractors, a third has verified links to the CIA, and the fourth benefited magnificently from large gifts to Congressmen.

By concentrating media, there is good assurance that there will be little discussion of issues, the discussion that does occur will only include the established topics, there will be no minor parties allowed, information has been transformed into advertisements (which are, by definition, propaganda.) That is why elections are almost meaningless.

Since television and other media account for most election expense, they account for a major component of campaign finance, and are the major beneficiaries of costly elections. What you will hear about is the need for taxpayers to pay the bill to broadcasters for elections ... not that they have any obligation to the public, or that the public is indeed the ultimate owner of the broadcast spectrum. With the powerful media that we have today, elections may never again have real meaning. Campaign finance reform translates to welfare for broadcasters.

You need only look to see that our information streams are now polluted. Television news has become less and less informative. Pack journalism assures that we will see celebrity trivia, but only distorted or blocked public issues. There was hardly a ripple when the OJ Simpson trial pre-empted the State of the Union Address, no serious public discussion of Healthcare 'reform', no mention of the 1100 economists (including 6 Nobel prize) winners who opposed the balanced budget amendment, only discussion of regressive taxes, little discussion of expensive, cold war, weapons systems which even the military doesn't want, scant coverage of ordinary workers, but plenty of coverage of President Clinton's affairs.

By framing trivial issues large, real problems are kept from public view. Discussion becomes constrained. By omitting certain information, the agenda is tightly controlled. Worse, conscientious reporters are fired when stories become controversial. (Gary Webb's Dark Alliance for example or CNN's April Oliver.)

Media filter out "inconvenient facts" like the collapse of domestic

economic opportunity to America's role as the world's leading jailer, arms supplier, polluter, and human rights abuser. (See McGowan's book "Derailing Democracy, the America the media doesn't want you to see.")

PBS and Pacifica have been seriously compromised.
<http://www.fair.org/reports/pbs-study-1999.html>

Are you surprised that violence among children is increasing? In 1989, Brandon Centerwall of the University of Washington, Seattle, established that television leads to violence, particularly in children, and is a public health hazard. . From 1990 to 1994 there was a 22 percent increase in the

rate of murder by teens aged 14 to 17. The FBI's most recent juvenile arrest records support this grim prediction: Weapons possession, aggravated

assault, robbery, and murder all rose more than 50 percent from 1987 to 1996. James Alan Fox of Northeastern University's College of Criminal Justice warns that, without remediation, the juvenile crime rate seems likely to increase. Although extensive evidence now exists, this kind of information is rarely acknowledged in the media. See

<http://www.ksu.edu/humec/impact.htm>

"An extraterrestrial being, newly arrived on Earth--scrutinizing what we mainly present to our children in television, radio, movies, newspapers, magazines, the comics, and many books -- might easily conclude that we are intent on teaching them murder, rape, cruelty, superstition, credulity, and

consumerism. We keep at it, and through constant repetition many of them finally get it. What kind of society could we create if, instead we drummed

into them science and a sense of hope." Carl Sagan. The Demon-Haunted World.

Random House. 1995

"...Today's children, who watch more television than ever before (an average of 22,000 hours before graduating from high school), according to the

Washington Post, also "suffer from an epidemic of attention-deficit disorders, diminished language skills, and poor reading comprehension." The

U.S. Department of Health and Human Services has discovered a direct link, and there is concern that TV might actually cause learning disorders.

"Most

[heavy viewing] kids", says psychologist Jerome Singer, "show lower information, lower reading recognition or readiness to reading, [and] lower

reading levels." They also "tend to show lower imaginativeness, and less complex language usage". Very recent research in this field suggests that TV

might in fact physically stunt the growth of a developing brain." from David Shenk's book, 'Data Smog, surviving the Information Glut'.

Surely, if television has this powerful affect, there should be some accountability. Although broadcasters should be held responsible for this crime against our children, Congress rewarded broadcasters with a massive giveaway of spectrum. <http://www.nader.org/releases/63099.html>

The Telecommunications Act had no detectable consumer benefit (Senator McCain said that the only one NOT represented was the public), but has made

most of us the target of telemarketers, price gouging (not only at pay phones), and no reductions of bills. Wireless phones, which are cheap and ubiquitous in Israel (even small children have them), are major expense items in the US.

The US is now a two-class society: Those with a voice that can be heard, and those without. People who do not have significant financial strength have no voice, should be delivered to advertisers, and need to be controlled. To demonstrate this the FCC has raided and forcibly shut down low power

broadcasters. Depriving ordinary people of a voice completes the process of media control. Only corporations can speak...and they have an agenda.

Considering the small number of entities involved, communication can easily be brought under control of the national security state. Even the potential

for that kind of control should trigger public concern, regulation, and anti-trust action. But no. People have been robbed of much of the benefit of

communication technology, advertisers may exploit and propagandize them at will, broadcasters under no public responsibility, and it is ominous that surveillance capability is now required by law for all electronic communications.

Concentrated wealth and concentrated media are inherently authoritarian. Free speech and free elections may be an illusion from the past. Any hope of

restoring true democracy, and with it a better breed of politicians, depends largely on stopping welfare to broadcasters, cleaning up our polluted information streams, and creating a better informed electorate.

What are the prospects of ever again getting a government that would truly govern on behalf of all people ? Of ever again getting politicians we can trust and respect? It won't happen as long as we keep losing the propaganda war. As long as most people are deluded into believing that free market

forces prevails, that the best government is the least government, that we are helpless pawns in the game of global competition, and that concentrated

media is OK, then we will continue to get the kind of disastrous governance that now prevails.

Also, I support the FCC's plan to hold a public hearing on this matter in Richmond, VA in February of 2003. I strongly encourage the Commission to hold similar hearings in all parts of the country and solicit the widest possible participation from the public. The rarified, lawyerly atmosphere of an FCC rulemaking is not an appropriate decision-making venue when questions as profound as the freedom of our media are at stake. I encourage the Commissioners to come out and meet some of the people who do not have a financial interest in this issue, but a social interest.

With the serious impact these rule changes will have on our democracy, it is important that the Commission take the time to review these issues more

thoroughly and allow the American people to have a meaningful say in the process.

Thank you,

Robert L. Vogel

Books describing these issues would fill a very large shelf, but I am including a few titles. There are many more.

Bibliography

MANUFACTURING CONSENT. Edward S. Herman and Noam Chomsky. Pantheon Books, New York. 1988. How issues are framed and topics chosen. Documents how propagandistic our mass media are, the manner in which the marketplace and the economics of the media shape the news. Edward Herman is Professor of Finance at the Wharton School of the University of Pennsylvania. Noam Chomsky is an MIT professor, Department of Linguistics and Philosophy.

THE MEDIA MONOPOLY by Ben Bagdikian. (Beacon Press. Boston. updated 1992.) Media is, increasingly, concentrated. Although the situation was bad enough in 1992 when this book was published, the trend has accelerated.

The More You Watch, the Less You Know. Danny Schechter. Seven Stories Press. 1997. "In America, the very idea of using publicly owned airwaves to broadcast in the public interest has been under attack for decades. Privatization is our ruling ideology in part because privately owned media restricts serious discussion of how it might be different. They do so less to serve abstract ideology than concrete interests, but the deeper effect is to undermine the very idea of a public interest."

"Made possible by ... the Death of PBS". Danial Ledbetter. 1997.

Corporate Media and the Threat to Democracy. Robert McChesney.

Centerwall, Brandon S., "Exposure to television as a risk factor for violence," American Journal of Epidemiology, 129/4, pp 643-652, April 1989. An Epidemiologist who has examined the evidence and found that media causes violence. Other studies have shown that television is a public health hazard, but you will never hear it from broadcasters.

Derailing Democracy, The America The Media Doesn't want you to see. Dave McGowan, Common Courage Press, 2000. "Following the same course that virtually every other major industry has in the last two decades, a relentless series of mergers and corporate takeovers has consolidated control of the media into the hands of a few corporate behemoths. The result has been that an increasingly authoritarian agenda has been sold to the American people by a massive, multi-tentacled media machine that has become, for all intents and purposes, a propaganda organ of the state." --Dave McGowan, from the introduction to "Derailing Democracy"

"The Central Intelligence Agency owns everyone of any significance in the major media." --Former CIA Director William Colby

http://www.commoncouragepress.com/mcgowan_derailing.html)

'Secrets' by Angus Mackenzie, University of California Press, 1997. subtitled the CIA's war at home. Describes the CIA's illegal, direct intervention into the domestic press.

CENSORED. the News That Didn't Make the News and Why. Carl Jensen (Founder of Project Censored) The Top Censored story: The Great Media Sellout to Reaganism. In return for loosened regulation, big media dispensed relentlessly positive news about Reaganism and the great trickle-down dream. The FCC relieved broadcasters of traditional public service requirements, made it almost impossible for citizens groups to challenge station license renewals and lifted limits on the number of stations a single corporation can acquire.

Sound & Fury. Eric Alterman. The Washington Punditocracy and the collapse of American Politics. A community that lacks the means to detect lies, . . . also lacks the means to preserve its own liberty.

The Chain Gang. One Newspaper versus the Gannett Empire. Richard Mccord, University of Missouri Press. 1996. This excellent book was an award winner, but you didn't hear about it from the newspapers. Richard Mccord, University of Missouri Press. 1996

Breaking the News. How the Media undermine American Democracy. James Fallows. Pantheon Books. New York. 1996.

Networks of Power, Corporate TV's Threat to Democracy. Dennis W. Mazzocco. South End Press. Boston, Mass 1994.

Abandoned in the Wasteland. Newton Minow. (Formerly of the FCC) Children are not the only victims of broadcasting, but Minow is not too concerned about the rest of us.

The Newscasters by Ron Powers: 1980. St. Martins Press. "Until local television news ceases to exploit the entertainment bias that is conditioned by its host medium, and shares some of the profit with its "market" in the form of comprehensive, compact newscasts, it is engaging in a pollution of the worst sort: a pollution of ideas. Its options should be the same as those of any polluter: clean up the mess or pay the consequences.

HOW TO TALK BACK TO YOUR TELEVISION SET. Nicholas Johnson. Atlantic Monthly Press. 1970. This book is old, but the problems described are more severe today. (Nicholas Johnson was a member of the FCC.)

Adventures in Medialand. Jeff Cohen and Norman Solomon, Common Courage Press. Monroe, Maine. 1993.

Make-Believe Media, the politics of entertainment. Michael Parenti. Saint Martin's Press. NY. 1992. See also "Inventing Reality, the politics of the Mass Media" by Michael Parenti.

"If we have 'learned' from motion pictures and television series that our nation is forever threatened by hostile alien forces, then we are apt to support increased military spending and warlike interventions. If we have 'learned' that inner city denizens are violent criminals, then we are more apt to support authoritarian police measures and cuts in human services to the inner city. (Michael Parenti. The Humanist. November/December 1990.)

"By the time American kids are 18 years old they have watched 26,000 murders on television alone. Heavy metal and rap lyrics often encourage rape and bigotry. It is contrary to common sense and research to think you can create such a culture and not have any effects." (From: Boys will be Boys: Breaking the link between masculinity and violence, by Myriam Miedzian. reviewed in Time magazine 9/16/91.)

The FCC: The Ups and Downs of Radio-TV Regulation, by William B. Ray, Ames, Iowa: Iowa State University Press. 1991. (Ray has been there. Chief of complaints for the FCC.) TV and radio programs have often broadcast wildly inaccurate news and/or information, only to be inadequately policed by the FCC. How Eisenhower FCC licensed only Republican stations, LBJ became wealthy, corruption in station licensing (assign then justify), and the disgraceful Reagan FCC promoted trafficking in stations, eliminated the fairness rules and generally has abandoned its role as protector of the public interest.

WHO WILL TELL THE PEOPLE. William Greider. Simon and Shuster 1992. Who gets heard, who gets ignored, and why. Relationships that link politicians with corporations and subvert the needs of ordinary citizens. How modern "methodologies of persuasion" from public relations firms, direct mail companies, opinion-polling firms, foundations, and consultants, have created a new hierarchy of influence over government decisions. A lone congressman who tries to represent the public interest can find himself aligned against an army of well paid authorities. The institutions designed to represent people: unions, political parties, press, are gone or transformed so radically that they no longer speak for the people. With lone exceptions, no one is intelligently monitoring the action for the taxpayers and alerting them to trouble. Political parties used to perform this role, but have abandoned it. The media report on selected events, but style and focus of their news do not fulfill this function either. Neither, for that matter, do the ranks of reformers and civic organizations, which are mostly devoted to their own specific issues.

AGENTS OF INFLUENCE, Pat Choate, how US interests in consumer electronics, and other industries have been sold off to Japan to

pay for the Reagan deficit. See the last chapter (12) especially.

Read All About It! James D. Squires. How Corporate owners of American Newspapers have sacrificed the ideals of a free press for profit and how democracy has suffered as a result. Insights into the relationship between the Chicago Tribune and the Cubs (baseball team), and on ownership of the New York Daily News. (Al Neuharth appears frequently. See his "how I became an SOB".)

THE NEXT CENTURY, David Halberstam, 1991, William Morrow and Company, Inc., New York. pg. 106. "Thanks to television, the national agenda becomes not what our long-range or our most pressing problems are, but those that produce the best film. This means that in a mass democratic society, the most critical part of the communications circulatory system, network television, is essentially blocked. As the network news format trivializes political debate, the political system adapts to it. Serious discussion of serious issues is too complicated. Candidates and their advisers learn what the networks want: a telegenic background and a hyped-up attack or counterattack, the more simplistic the better. Television runs only ten and fifteen second sound bites from our leading politicians; soon the politicians begin to talk in such brief bites; finally they begin to think in them."

The Electronic Republic. Lawrence K Grossman. Viking. Twentieth Century Fund

Book. 1995. Lawrence K. Grossman former head of NBC news and president of the Public Broadcasting Service describes events at NBC after it was purchased by General Electric. Mr. Grossman has excellent recommendations but, as always, Republicans are on the other side. The fact is there is strong control of the press and communications by a small group that are control our agenda for their own ends.

Three Blind Mice: How the Networks lost their way. Ken Auletta; Random House; 656 pages. "Now everyone can see how a diet deprived of independent journalism in the mass market, that is can shrink society's stomach for the

truth." It may not be possible to reform an information-delivery system so deeply commingled with the political and economic command system that is so

well entrenched in this country. "Book review in Time, August 12, 1991 (p 60):